## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA AND STATES OF THE UNITED STATES, EX REL PATRICK DONOHUE

20-CV-5396 (GHW)

Civil Action

Plaintiffs,

-AGAINST-

RICHARD CARRANZA, ET AL.

Defendants

## DEFENDANTS' NOTICE OF MOTION TO DISMISS IN LIEU OF AN ANSWER

**PLEASE TAKE NOTICE** that, upon the attached Memorandum of Law, and all the proceedings heretofore had herein the Defendants, Loudoun County Public School District and Scott A. Ziegler will move before the Honorable Gregory H. Woods, U.S.D.J. of the United States District Court for the Southern District of New York, at the United States District Courthouse, located at 500 Pearl Street, New York, NY 10007, at a time and place to be scheduled by this Court, for an order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure and Local Civil Rule 11.1 granting Defendants' Motion to Dismiss Plaintiffs' Complaint.

METHFESSEL & WERBEL, ESQS.

Attorneys for Defendants

By:\_\_\_\_\_ Eric L. Harrison

DATED: NEW YORK, NEW YORK

December 27, 2021